

Remedium

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Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – November 2009

Dear Bonnie:

This progress report describes work completed during the month of November 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during November 2009.

A. ACTIONS TAKEN

- Continued activity-based sampling (ABS) under Revision 3 of Attachment A of the Phase III SAP. ABS Round 8 began on November 9 and was interrupted by snow on November 11, after ABS had been performed at only three locations (ABS-02, ABS-05 and ABS-07). Due to winter conditions, ABS field activities have been suspended for the 2009 season.
- With the onset of winter, the ISCO automatic samplers/flow sensors were removed from stations LRC-06, LRC-02 and CC-02 on November 11, 2009.
- Performed a tour of the OU3 mine site with EPA and HDR, the new oversight contractor for OU3 RI activities, on November 19, 2009.

B. SAMPLING RESULTS

Evaluation of the ABS air sampling cassettes by Hygeia Laboratories indicates that most ABS samples collected under the revised flow rates and activity durations specified in Revision 3 of Attachment A of the Phase III SAP can be analyzed directly.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Begin preparation of the Phase III Field Sampling Summary Report and continue preparation of the OU3 Remedial Investigation Report.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

None.

Parametrix

The following is a summary of the actions taken and progress made during the month of November.

A. ACTIONS TAKEN

- Prepared for BTAG Subgroup meeting at EPA, Denver;
- Attended BTAG Subgroup meeting in Denver with Bill Stubblefield and EPA scientists;
- Initiated preparation of BTAG Subgroup recommendations memo (Stubblefield);
- Continued coordination with Northwest ZooPath on histology;
- Small mammal necropsy equipment inventory and remaining demobilization activities;
- Initiated literature review for eye lens weight/age relationship to support planned lab work;
- Data management activities for small mammal program permit reporting;
- Initiated outlining and preparing aquatic and small mammal program data reports; and
- Continued financial reporting, supervision and project management activities.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Finalize aquatic program equipment demobilization activities;

- Prepare and submit BTAG Subgroup recommendations memo (analytical, bioassay recommendations);
- Receive histology report from NorthWest ZooPath;
- Initiate analysis of aquatic program data;
- Submit small mammal and aquatic program permit data;
- Prepare aquatic program data report;
- Receive histology results;
- Prepare small mammal program data report (field plus histology); and
- Prepare bioassay protocol addressing fiber/clump analytical and exposure concerns (see below).

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/
ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

The BTAG subgroup identified concerns with the analytical method(s) used for asbestos in surface water with regard to the reporting of clumped versus free fibers and resulting implications of the method(s) to providing an understanding and basis for evaluating aquatic exposure (i.e., in the planned bioassay). The Subgroup is developing a memo with recommendations that include approaches for addressing analytical method shortcomings.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner - Grace
John Garr - MWH
Robert Marriam - Grace
Sue Robinson - Parametrix
Dick Sloan - Montana DEQ